

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

CLAUDIA M. COOPER; and  
FREDERICK E. COOPER

vs.

VERIZON NEW ENGLAND, INC.

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\*

CA 14- 351S

C.A. No.:

U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

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FILED

**COMPLAINT**

**(Parties & Jurisdiction)**

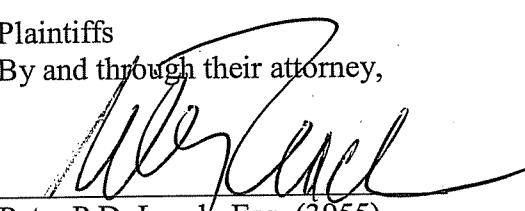
1. Plaintiff, Claudia M. Cooper, is a resident of the Town of Greene, State of Rhode Island.
2. Plaintiff, Frederick E. Cooper, is a resident of the Town of Greene, State of Rhode Island.
3. Defendant, Verizon New England, Inc., [Verizon] is a close corporation organized and existing under the laws of the State of New York. By virtue of its business activities within the State of Rhode Island, it has the necessary minimum contacts within the State of Rhode Island to confer jurisdiction on this court pursuant to R.I.G.L. §9-5-33 as amended, and subjecting said Defendant to the personal jurisdiction of the Courts of the State of Rhode Island.
4. Defendant, Verizon, was the owner of the motor vehicle [motor vehicle] operated by Richard Guerra on August 4, 2011. Pursuant to R.I.G.L. §31-33-6 and §31-33-7, Defendant, Verizon, is liable as the owner of said motor vehicle operated by Richard Guerra.
5. At the time of Plaintiff's injuries on August 4, 2011, Richard Guerra was operating said motor vehicle with the consent of Defendant, Verizon.
6. This is a claim resulting in serious personal injuries to the plaintiff. As such, the monetary amount claimed is in excess of \$75,000.00, exclusive of the interest and costs, and is sufficient to meet the jurisdiction of this Honorable Court.
7. Jurisdiction over the subject matter exists, pursuant to Rule 28 U.S.C. §1332, as a result of diversity.

**Count I  
Negligence**

7. On or about August 4, 2011, Richard Guerra, acting within the scope of his employment with Verizon, owed a duty of care to the plaintiff, Claudia Cooper, to operate said motor vehicle with due care.
8. Richard Guerra, acting within the scope of his employment with Verizon, breached said duty of care by negligently operating said vehicle, thereby causing the plaintiff, Claudia Cooper, to suffer and become inflicted with severe personal injuries and extreme pain and suffering.
9. As a direct and proximate result of the negligence of Richard Guerra, [acting within the scope of his employment with Verizon] the plaintiff, Claudia Cooper, was severally and permanently injured, suffered great pain of the body, and nervous system, was rendered disabled, and suffered both loss wages and earning capacity.
10. As a direct and proximate result of the negligence of Richard Guerra; [acting within the scope of his employment with Verizon], the plaintiff, Frederick Cooper, has suffered a loss of his wife's love, society and companionship, pursuant to RIGL §9-1-41.
11. At all times hereto mention, the plaintiff, Claudia Cooper, was in exercise of due care for her own safety and the safety of others.

**WHEREFORE**, the Plaintiffs, Claudia M. Cooper; and Frederick E. Cooper, demand judgment against the Defendant, Verizon New England, Inc., for compensatory damages plus interest and costs.

Plaintiffs  
By and through their attorney,



Peter P.D. Leach, Esq. (3955)  
293 South Main Street, Suite 1  
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(401) 521-9100

**DATE:** August 1, 2014

**PLAINTIFFS DEMAND A JURY TRIAL and DESIGNATES  
PETER P.D. LEACH, ESQ. AS TRIAL COUNSEL**